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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

JANE JONES,  
Plaintiff,  
v.

PI KAPPA ALPHA INTERNATIONAL FRATERNITY, INC.; PI KAPPA ALPHA FRATERNITY MEMBER BRETT HELBERG in his individual and official capacity; PI KAPPA ALPHA FRATERNITY MEMBER DAVID MALINOWSKI in his individual and official capacity; PI KAPPA ALPHA FRATERNITY – LOCAL CHAPTER MU ZETA at RAMAPO COLLEGE; PI KAPPA ALPHA FRATERNITY/MU ZETA CHAPTER PRESIDENT SKENDER AGIC, in his individual and official capacity; PI KAPPA ALPHA FRATERNITY/MU ZETA CHAPTER MEMBER JOHN HOGAN in his individual and official capacity; PI KAPPA ALPHA FRATERNITY/MU ZETA CHAPTER MEMBER JOSHUA WILLIAM NEWMAN in his individual and official capacity; RAMAPO COLLEGE OF NEW JERSEY; RAMAPO COLLEGE BOARD OF TRUSTEES; RAMAPO COLLEGE OF NEW JERSEY PUBLIC SAFETY DIRECTOR VINCENT MARKOWSKI, in his individual and official capacity; RAMAPO COLLEGE OF NEW JERSEY PRESIDENT PETER MERCER, in his individual and official capacity; RAMAPO COLLEGE OF NEW JERSEY COORDINATOR OF SUBSTANCE ABUSE & PREVENTION CORY ROSENKRANZ, in her individual and official capacity; RAMAPO COLLEGE OF NEW JERSEY ACTING DEAN

CIVIL ACTION  
CASE NO.: 16-cv-7720

**MOTION TO ENTER DEFAULT  
JUDGMENT  
Pursuant to Rule 55(b)(2)(B)  
AGAINST DEFENDANT PI KAPPA  
ALPHA FRATERNITY-LOCAL  
CHAPTER MU ZETA AND  
DEFENDANT NAKEEM GARDNER**

OF STUDENTS MELISSA VAN DER WALL;  
JORDYN MASSOOD, former Ramapo College  
of New Jersey Student; CHRISTOPHER  
RAINONE, former Ramapo College of New  
Jersey Student; JUSTIN SOMMERS; former  
Ramapo College of New Jersey Student; KORIN  
LEVETSANOS former Ramapo College of New  
Jersey Student; WAYNE JOHNSON former  
Ramapo College of New Jersey Student;  
CHRISTIAN LOPEZ former Ramapo College of  
New Jersey Student; NAKEEM GARDNER  
former Ramapo College of New Jersey Student;  
JOHN/JANE DOES #1-20, individually and in  
their official capacity; and XYZ  
CORPORATIONS #1-10, individually, jointly,  
and severally and in the alternative,  
Defendants.

TO: Court Clerk  
Martin Luther King Federal Building & U.S. Courthouse  
50 Walnut Street, Room 2042  
Newark, NJ 07101

The undersigned Counsel, on behalf of Plaintiff, Jane Jones, moves before this Court for Entry of a Default Judgment as to Defendants: Pi Kappa Alpha Fraternity Local Chapter Mu Zeta and Nakeem Gardner, upon the Complaint heretofore filed and served upon the Defendants, in accordance with the provisions of Rule 55(b)(2)(B), Federal Rules of Civil Procedure.

I submit the accompanying Certification of Default Judgment in support of this application.

Respectfully Submitted,

Dated: March 31, 2023

By: *s/Patrick J. Whalen, Esquire*  
*Attorney for Plaintiff*